

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GUY WILLIAMS,

Plaintiff(s),

v.

CITY OF TRENTON, TRENTON
POLICE DEPARTMENT, MR.
KENNETH LUGO,

Defendant(s).

HONORABLE TONIANNE J. BONGIOVANNI
U.S. Magistrate

CIVIL ACTION NO.
3:11-cv-06352

**NOTICE OF MOTION FOR SUMMARY JUDGMENT ON BEHALF OF
DEFENDANTS, CITY OF TRENTON, TRENTON POLICE DEPARTMENT AND
OFFICER KENNETH LUGO**

TO: Matthew B. Weisberg Esquire
Weisberg Law, P.C.
7 South Morton Avenue
Morton, PA 19070

PLEASE TAKE NOTICE that on _____ 2012, at _____, a.m., or as soon thereafter as counsel for defendants may be heard, the undersigned attorney for said defendant(s) will apply to the United States District Court of New Jersey, Clarkson Fisher Federal Bldg & US Courthouse, 402 East State Street, Trenton, New Jersey, for an Order granting Request for Admissions be deemed Admitted, pursuant to Fed. R.Civ.P. 12(c). Attached hereto is a Brief and Certification in support of this Motion and a proposed form of Order. **Defendant hereby requests Oral Argument be heard if Opposition is filed.**

BY: J. BROOKS DIDONATO
J. BROOKS DIDONATO
Attorneys for Defendant(s),
City of Trenton, Trenton Police
Department, Officer Kenneth Lugo

Dated: October 31, 2012

I hereby certify that the original Notice of Motion and an original and three (3) copies of the proposed form of Order were served and filed pursuant to the Federal Rules of Civil Procedure and the Local District Court Rules.

s/ J. BROOKS DIDONATO
J. BROOKS DIDONATO

Dated: October 31, 2012

CERTIFICATION OF MAILING

I, J. BROOKS DIDONATO of full age, hereby certify that:

I am employed by the law firm of Parker McCay P.A., Attorneys for Defendant(s), City of Trenton, Trenton Police Department, and Officer Kenneth Lugo, in this matter, and on October 29, 2012, I electronically mailed the within Notice of Motion to the following:

Matthew B. Weisberg Esquire
Weisberg Law, P.C.
7 South Morton Avenue
Morton, PA 19070

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/ J. BROOKS DIDONATO